

The Medical Marijuana Registry supports Colorado citizens' medical care needs by administering a statewide program for legal access to medical marijuana.

Policy and Procedures Update August 2012

On September 1, 2012, the Registry will be releasing new forms. This *Policy and Procedures Update* provides an overview of changes made at the Registry to increase efficiency in managing patient records and processing paperwork. **For questions or comments, please contact us at 303-692-2184 or medical.marijuana@state.co.us.**

Proof of Identity and Residency Requirements

Per the Colorado Constitution, medical marijuana registration cards are only available for Colorado residents. In addition, the Registry must comply with the federal Secure and Verifiable Records Act and require photo-based identification of patients before making any changes to their records. In an effort to streamline these verification processes, the following changes have been made:

- 1. Proof of residency required on applications only:** The Registry has removed the proof of residency requirements from all forms except the application.
- 2. Proof of identity requirements have been clarified:** In addition to state-issued driver's licenses or state-issued photo IDs, the Registry will also accept U.S. passports, military IDs and tribal IDs. All documents must be currently valid when received at the Registry. Damaged, expired, or tampered IDs are not valid. All IDs must be verifiable and have specific issue and expiration dates. For more details, please see requirements as listed in form instructions.
- 3. Proof of residency documentation changes:** Patients who submit applications and do not have a Colorado-issued driver's license or photo ID must also submit documentation to prove Colorado residency. Full details are provided in MMR Policy Number 2012-8, available on our website. The following is a brief overview of proof of residency documentation changes:
 - Proof of Colorado employment:** Employment can be demonstrated by a paycheck stub or the most recent year's W-2 or certified Colorado tax return.
 - Copy of an entire utility or cable bill:** Only bills from electric, gas, water, phone, cable and trash companies are accepted. All addresses on the bill must be in Colorado. Bills must be dated within 60 days of the date received by the Registry. Bills must be complete, including payment coupons.
 - Copy of a Colorado government-issued letter or certification document:** All documentation must include the agency logo and name; the patient's name and address; an account, case or certification number; and be on a standard format that can be verified.
 - Medical bills are no longer accepted:** The Registry has removed medical bills as a valid document for proof of residency due to the non-standardized formats and inability to verify patient records.

Form Coding System

All new forms have been given a two-letter code which is displayed in the upper right corner of the form. This coding system is designed to provide a visual cue for easy recognition of forms required to accomplish Registry processes. The most commonly used forms are:

<u>Code</u>	<u>Form #</u>	<u>Form Name</u>
AP	1001	Application
CR	1003	Change of Patient Records
FW	1010	Request for Fee Waiver
HB	1011	Change of Homebound Status
LS	1004	Report of Lost, Stolen or Damaged Card
PC	1001/ 1011	Physician Certification
RP	1005	Request for Patient Information
SU	1007	Request to Surrender Registry Card

Application Rejection Process Modifications

As of August 13, 2012, the Registry has modified its application rejection process in an effort to increase correction rates for patients and reduce potential for denied applications.

- 1. Retention of rejected applications:** The Registry will no longer return rejected paperwork to patients along with the rejection letter requesting corrections. By retaining the patient's paperwork, the Registry will be able to provide more direct customer service to patients with questions about corrections required.
- 2. Corrections may be faxed and/or e-mailed:** To speed the process, patients who have non-monetary corrections may fax or e-mail their supplemental paperwork to the Registry. Instructions for correction submissions are included in the rejection letter.

Standard Processing Time: As stated in the form instructions, the standard processing time is 4 to 6 weeks. Please encourage patients to wait at least 4 weeks before checking status on their paperwork.

Tips for Successful Submissions

1. **Clearly write out complete patient address.** The Registry receives many cards back in return mail due to bad addresses. Please ensure that patients spell out street names and include apartment/unit numbers. Do not abbreviate words like 'County Road' to 'CR.' To avoid breaches of confidential information, the Registry keys data from applications just as it is written on the form.
2. **Submit ONLY ONE application or form per envelope.** Recently, the Registry has seen an increase in mail from Medical Marijuana Centers containing more than one patient record. Per application instructions, "***Application packets must be sent separately. Only one application packet and check/ money order per envelope.***" All mail containing paperwork for more than one patient is rejected. The certified mail numbers assigned to these mail pieces are invalid as proof for purchase.
3. **Provide patients with current, complete forms.** The most current forms will be released September 1, 2012. Please be sure that patients receive a copy of all paperwork, including the instruction pages. The Registry receives multiple calls from patients whose paperwork was rejected because they did not have a copy of the instructions for submission and missed required elements.
4. **Verify all information with patients.** A significant number of rejections are due to application data errors. When completing paperwork with patients, please read information aloud to verify patient understands and confirms the information before signing. *One of the most common errors is that the social security number on forms does not match the number in our database.*
5. **Use standard notary protocol.** Many patients submit copies of paperwork, rather than the originals. When notary seals are stamped in colors other than black, they often do not copy well. The Registry is then required to make further inquiry to verify the validity of the seal. In addition, it appears some forms are being pre-notarized. All forms must be signed and dated in front of the notary. A common reason for rejection is that the patient's date of signature does not match the notary's signature date.
6. **Provide clear, complete, and easily read copies of Photo ID.** Many applications are rejected because the copy of the patient's ID are too blurry or too dark to read. The Registry prefers a clear black and white copy of the ID that displays the photo, the date of birth, license number, expiration date, and patient's name in a manner that is easily scanned. **Color copies are not required.**

Application Denial Process

Effective May 1, 2012, the Registry established database requirements to monitor and enforce Board of Health application denial regulations based on the number of application submissions per patient. Per Board of Health regulations, "The department may deny an application...If the department has twice rejected the patient's application, and the applicant's third submission is incomplete. If the department denies an application, then the applicant may not submit a new application until six months following the date of denial and may not use the application as a registry card."

New submission after denial status

Patients who have been denied for any reason must wait six months before submitting new paperwork. Please advise patients to wait until the denial period is expired before submitting new paperwork, as their applications will be rejected. For example, patients who have a denial letter dated December 30, 2011 are not able to submit new paperwork until July 1, 2012. When patients do re-apply, they must submit a new application packet and registration fee. For questions about the denial process, please contact Carla at 303-691-4039.